

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

CRYSTALLEX INTERNATIONAL CORP.,)	
)	
Plaintiff,)	
)	
v.)	No. 17-151-LPS
)	
BOLIVARIAN REPUBLIC OF)	
VENEZUELA,)	
)	
Defendant.)	

**BLUE WATER VENTURE PARTNERS, LLC’S
MOTION FOR EXPEDITED CONSIDERATION OF MOTION
REQUESTING APPROVAL OF THE COURT TO CONSIDER UNSOLICITED BID**

1. Blue Water Venture Partners, LLC (“Blue Water”) respectfully submits this Motion for expedited consideration of its Motion Requesting Approval of the Court to Consider Unsolicited Bid, filed contemporaneously herewith (the “**Bid Motion**”)¹. As discussed in the Bid Motion, the Proposed Bid presented by Blue Water is materially stronger than the current recommended bid presented by the Special Master. Blue Water’s Proposed Bid is filed with the Court at D.I. 2276. Blue Water’s bid offers superior terms and greater value to all stakeholders involved in the sale process. Accordingly, it is in the interest of fairness and maximizing the outcome of the sale for the Court to permit the Special Master to review the unsolicited bid from Blue Water and determine whether it should replace the currently recommended bid.

2. The Court should agree to hear the Bid Motion on an expedited basis, prior to any the Sale Hearing currently scheduled to begin on September 15 (or any other hearing to approve any other bid), because Blue Water’s Proposed Bid is superior to both the Amber Bid and the Gold

¹ Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Bid Motion.

Reserve Bid. Without consideration of the Blue Water bid, other parties persist with a less favorable offer. To avoid unnecessary delay and to allow the Court to be apprised of the strongest possible bid before proceeding, expedited hearing is warranted. The Special Master is unable to review or consider the Proposed Bid without an order from the Court permitting him to do so, necessitating the request for the relief in the Bid Motion. Due to the limited time available prior to the Sale Hearing as it is currently scheduled, and because even an immediate order from the court authorizing and directing the Special Master's consideration of the Proposed Bid would not provide sufficient time for the Special Master to undertake this review before the Sale Hearing's commencement as now set, Blue Water further respectfully requests that the Court adjourn the Sale Hearing. This delay would assure that the Special Master receives the opportunity to evaluate Blue Water's superior Proposed Bid and provide the Court with an updated recommendation. Realistically, upon an order's entry, an adjournment of the Sale Hearing is the only way that the Special Master may be able to thoroughly review the Proposed Bid.

3. In summary, Blue Water respectfully requests for the expedited hearing to occur prior to the Sale Hearing, which is now scheduled for September 15, 2025 at beginning at 8:30 a.m. ET. If the Bid Motion is granted, the Sale Hearing should be adjourned so that the Special Master can effectively consider the Proposed Bid.

4. Blue Water, the Special Master, and the Sale Process Parties have not met and conferred under Local Rule 7.1.1 due to the *Memorandum Order Approving Proposed Bidder Protections* D.I. 1554, which requires the Court to permit the Special Manager to engage with a party bringing an Unsolicited Bid. *See Scheduling Order* D.I. 2110 para. 7. The Special Master, reiterated that he requires a Court order permitting him to engage with Blue Water and review its Proposed Bid.

Conclusion

WHEREFORE, Blue Water respectfully requests the Court expedite its consideration of the Bid Motion to a time before the currently scheduled Sale Hearing and, upon granting the Bid Motion, adjourn the Sale Hearing so that the Special Master may review the Proposed Bid, converse with Blue Water in relation to it, and provide an updated recommendation, together with such other and further relief as the Court shall deem appropriate.

[Signature Page Follows]

Dated: September 12, 2025
Wilmington, Delaware

Respectfully submitted,

**BENESCH FRIEDLANDER COPLAN
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